

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESALE PRICE	)	MDL No. 1456
LITIGATION	)	Civil Action No. 01-12257-PBS
	)	
<b>THIS DOCUMENT RELATES TO:</b>	)	Hon. Patti B. Saris
	)	
<i>U.S. ex rel. Ven-a-Care of the Florida Keys,</i>	)	Magistrate Judge Marianne B. Bowler
<i>Inc. v. Abbott Laboratories, Inc.</i>	)	
No. 07-CV-11618-PBS	)	

**DECLARATION OF C. JARRETT ANDERSON SUBMITTING EXHIBITS  
IN SUPPORT OF PLAINTIFF'S RESPONSE TO  
ABBOTT'S MOTION TO DISMISS**

I, C. Jarrett Anderson, do hereby declare as follows:

1. I am an attorney at law in the State of Texas and counsel for Plaintiff Ven-A-Care of the Florida Keys, Inc. ("VAC"). I am a member in good standing with the State Bar of Texas. I have been admitted pro hac vice before this Court and am in good standing.

2. On behalf of the Plaintiff VAC, I am submitting with this declaration Exhibits in support of Plaintiff's Response to Abbott's Motion to Dismiss.

3. The following exhibits are true and correct copies of the materials described therein and submitted with this declaration:

Exhibit No.	Description
1	Message from Abbott CEO, Miles White, displayed on Abbott website
2	Article referring to "PruCare" as HMO related to insurer, Prudential Healthcare

I swear under the penalties of perjury that the foregoing statements are true and correct.

/s/ Jarrett Anderson  
C. Jarrett Anderson

Executed this 2nd day of November, 2009

I hereby certify that I have this day caused an electronic copy of the above **DECLARATION OF C. JARRETT ANDERSON SUBMITTING EXHIBITS IN SUPPORT OF PLAINTIFF'S RESPONSE TO ABBOTT'S MOTION TO DISMISS** to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

Dated: November 2, 2009

/s/ Jarrett Anderson  
C. Jarrett Anderson